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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

TETSUYA NAKAMURA, an individual,  
  
 Plaintiff,  
  
 v.  
  
 SUNDAY GROUP INCORPORATED, a  
 Delaware corporation, *et al.*,  
  
 Defendants.

Case No.: 2:22-cv-01324-MMD-EJY

**STIPULATION AND ~~PROPOSED~~  
 SCHEDULING ORDER**

Plaintiff Tetsuya Nakamura and Defendants Sunday Group Incorporated, SGI Trust, Toshiki (Todd) Mitsuishi and James Pack (collectively, “Defendants”), hereby stipulate as follows:

WHEREAS, Plaintiff’s response to Defendants’ amended counterclaims is due on or before October 5, 2023, with Defendants’ opposition due on or before November 2, 2023, and Plaintiff’s reply due on or before November 30, 2023 (Dkt. 60);

WHEREAS, in parallel, discovery is ongoing;

WHEREAS, as it stands, initial expert disclosures are due on October 27, 2023, rebuttal expert disclosures are due on November 27, 2023, and fact discovery shall be completed by December 27, 2023 (Dkt. 50);

WHEREAS, the parties have begun serving and responding to written discovery requests but anticipate the need for additional time to complete discovery, including to schedule and take depositions;

WHEREAS, certain persons the parties intend to depose reside in Japan, thus presenting logistical obstacles to scheduling and completing the depositions; and

WHEREAS, the parties stipulate to extend certain discovery deadlines as follows;

**IT IS ACCORDINGLY STIPULATED**, pursuant to Civil L.R. 6-1 and 6-2, that, subject to any further request for an extension of time:

1. Fact discovery shall be completed by March 29, 2024.
2. Initial expert disclosures shall be made no later than February 1, 2024. Rebuttal expert disclosures shall be made no later than March 1, 2024.
3. The last day for filing dispositive motions shall be April 30, 2024.
4. The joint pretrial order shall be due no later than May 31, 2024, unless dispositive motions are pending on that date in which case the due date for the joint pretrial order is automatically extended to 30 days after a decision is issued on such motions.

DATED: September 14, 2023

**CLYDE SNOW & SESSIONS, P.C.**

By: /s/Timothy R. Pack  
Timothy R. Pack (UT Bar # 12193)

Attorneys for Defendants  
SUNDAY GROUP INCORPORATED,  
SGI TRUST, TOSHIKI (TODD) MITSUISHI  
AND JAMES PACK

DATED: September 14, 2023

**FENWICK & WEST LLP**

By: /s/Casey O'Neill  
Casey O'Neill

Attorneys for Plaintiff  
TETSUYA NAKAMURA

**ORDER**

IT IS SO ORDERED:

  
THE HONORABLE ELAYNA J. YOUCHAH  
UNITED STATES MAGISTRATE JUDGE

DATED: September 15, 2023